## **EXHIBIT J**

## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC. SECURITIES LITIGATION	)	Civ. Action No. 04-10294 DPW

## STIPULATION REGARDING ERNST & YOUNG LLP'S 3.5 GIGABYTES OF ELECTRONICALLY STORED INFORMATION

This agreement concerns Ernst & Young, LLP's ("E&Y") 3.5 gigabytes of electronically stored information ("ESI") containing the electronic desk files of the E&Y engagement team, which E&Y collected in response to the subpoena served by Lead Plaintiff on July 26, 2006 in the above-captioned matter. Defendant Sonus Networks, Inc. ("Sonus") will conduct a limited privilege review of the ESI dated on or after January 1, 2004, by searching it for terms designed to capture ESI subject to a claim of attorney-client privilege or work product immunity. Sonus will then agree to E&Y's production of any ESI not captured by this search. Following a review of the ESI captured by the search, Sonus will agree to E&Y's production of any additional non-privileged ESI. Sonus has already agreed to E&Y's production of any ESI dated prior to January 1, 2004. To the extent any of the ESI is withheld by Sonus on grounds of attorney-client privilege or work product immunity, it will be identified on a privilege log to be provided by Sonus.

The parties agree that if any ESI subject to a claim of attorney-client privilege or work product immunity is produced, such production shall in no way prejudice or otherwise constitute a waiver of, or an estoppel as to, any claim of privilege or work product immunity for such ESI. Paragraph 12 of the Protective Order entered by the Court in this matter on December 26, 2006 shall govern if the production includes any ESI subject to a claim of privilege or immunity.

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